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March 22, 1991

VIA HAND DELIVERY

United States Environmental
Protection Agency
Office of Waste Programs Enforcement
Room S364/East Tower
Mail Code OS-500 USEPA
401 M Street, S.W.
Washington, D.C. 20460



Attention: Bruce M. Diamond, Director
Office of Waste Programs Enforcement

Re: Employer's Insurance of Wausau's
Petition for Reimbursement of Costs
Under 42 U.S.C. Section 9606(b)(2)
CIW Site, Romulus Michigan

Dear Mr. Diamond:

Please find enclosed our client's, Employers Insurance of Wausau's, Petition for Reimbursement of Costs under Section 106(b)(2) of CERCLA, 42 U.S.C. Section 9606(b)(2). Also, please find attached Petitioner's Group Exhibit 1 and Exhibit 2 to the Petition.

We have been informed by your office that the USEPA has not yet issued any regulations or guidance documents establishing procedures to process a Petition for Reimbursement, other than delegations of authority. Accordingly, we assume that your office will assemble and give us notice of the documents constituting the proposed Administrative Record, that you will advise us how you propose to proceed with respect to issues on which review is not limited to the Record, and what procedures you propose regarding our request for a hearing on the Petition.

Finally, as Wausau's public Comments of January 2, 1990 stated, and as further requested of the USEPA from time to time,

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Mr. Bruce M. Diamond
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several documents should be added to the Record for your review. All of these documents should be in the possession of USEPA's Region V office, except for CIW site documents under seal at one time which Region V recently directed Wausau to take possession of from Region V following Wausau's delivery of the documents to Region V's offices. Upon request, we will be pleased to assist in making any and all documents available to you.

Thank you for your attention to these matters.

Very truly yours,

JOHNSON & BELL, LTD.



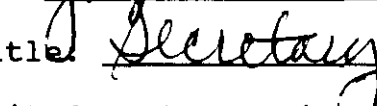
Frederick S. Mueller

FSM/baa
Enclosures

cc: Honorable Valdas V. Adamkus, Administrator USEPA Region V
(with Petition for Reimbursement excluding Exhibits)
(via Hand Delivery)

Received this 22nd day March, 1991

By: 

Title: 

United States Environmental Protection Agency
Washington, D.C.